

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 9, 2015

Mr. Sumeet Singh, Vice President
Pacific Gas and Electric Company
Gas Asset and Risk Management
6111 Bollinger Canyon Road, Room 4590-D
San Ramon, CA 94583

GW-2015-01

SUBJECT: PG&E's Cross Bore Inspection Program

Dear Mr. Singh:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney conducted an investigation related to PG&E's cross bore inspection program.

SED found that contract personnel performing "proximity clearances" as a part of PG&E's cross bore inspection program were not qualified to perform the inspections under the Operator Qualification (OQ) rule. SED staff believes these "proximity clearances" are a covered task as defined in Title 49, Code of Federal Regulations (CFR), §192.801(b). Further, CFR §192.805(b) requires operators to "Ensure through evaluation that individuals performing covered tasks are qualified." PG&E is therefore in violation of CFR §192.805(b).

On 4-21-15, SED staff met with PG&E representatives and discussed the OQ requirement. PG&E representatives stated that contract personnel performing "proximity clearances" would be qualified at PG&E's training center. We also note that PG&E stated that "proximity clearances" already conducted by unqualified contract personnel would not be accepted as complete.

Within 30 days of your receipt of this letter, please provide a written response confirming that PG&E has qualified or will qualify all contract personnel that will perform proximity clearances, and that proximity clearances already done by unqualified personnel will not be accepted as complete.

If you have any questions, please contact Paul Penney at (415) 703-1817 or by email at Paul.Penney@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division